

**SIDLEY & AUSTIN**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION

CHICAGO  
DALLAS  
LOS ANGELES  
NEW YORK  
SEATTLE

1722 EYE STREET, N.W.  
WASHINGTON, D.C. 20006  
TELEPHONE 202 736 8000  
FACSIMILE 202 736 8711

HONG KONG  
LONDON  
SHANGHAI  
SINGAPORE  
TOKYO

FOUNDED 1866

WRITER'S DIRECT NUMBER  
(202) 736-8235

WRITER'S E-MAIL ADDRESS  
mnemerof@sidley.com

December 5, 2000

Federal Election Commission  
Office of the General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463  
Attention: Jonathan Levin

*Late Comment*  
*AOR 2000-36*

Re: AOR 2000-36: Andersen Consulting PAC

Dear Mr. Levin:

We are counsel to Arthur Andersen PAC and Arthur Andersen LLP, and we are responding to your invitation for comment. We have reviewed the Request for an Advisory Opinion submitted by John C. Keeney, Jr. dated October 26, 2000. We agree that Andersen Consulting PAC is not affiliated with Arthur Andersen PAC within the meaning of 11 C.F.R. § 100.5 (g)(2). This conclusion stems from the Arbitration Order dated August 7, 2000, as a result of which Arthur Andersen LLP and Andersen Consulting LLP are no longer affiliated. We further agree that application of the Commission's affiliation criteria support the conclusion that, since the Arbitration Order, neither the companies nor the PACs are affiliated with each other. 11 C.F.R. § 100.5(g)(4)(ii)(A) - (J). If you have any questions, please do not hesitate to contact us.

Sincerely,



Michael A. Nemeroff

DEC 5 11 08 AM '00

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL